

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

Donald Abuda, et al.,

Plaintiffs,

v.

STRONGBLOCK, et al.

Defendants.

Case No. 1:22-cv-10869

**NOTICE OF MOTION TO DISMISS AND  
COMPEL ARBITRATION**

Oral Argument Requested

Upon the accompanying Memorandum of Law and supporting Declaration of David Moss, with exhibits, Defendant Jenison Holdings SEZC, improperly named above by its tradename “Strongblock,” and individual Defendants David Moss, Brian Abramson, Corey Lederer, and Konstantin Shkut, move this Court, before the Honorable Laura Taylor Swain, Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., New York, NY 10007-1312, to dismiss this suit and compel arbitration under the Federal Arbitration Act, 9 U.S.C. § 1 *et seq.*

The undersigned certifies that Defendants’ counsel, Kate O’Hara Gasper, spoke with Daniel B. Ravicher on the telephone on March 2, 2023, and used her best efforts to resolve informally the matters raised in Defendants’ submission. The challenged pleading has not been amended in response to the matters raised either in the telephone call, or in Defendants’ prior briefing in the related case, *Crowl, et al. v. StrongBlock*, Case No. 1:22-cv-7313.

Dated: March 6, 2023

Respectfully submitted,

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